

EmpCo | Sustainability communications

Why EmpCo also matters for B2B companies

From Sustainability claims to credible proof

EmpCo turns evidence-based environmental claims into a source of credibility and differentiation.



01 EmpCo & B2B relevance

“We will be net zero by 2030.”

“Our technology enables lower-carbon production.”

“A more sustainable choice.”

Statements like these have become a familiar part of corporate communication, appearing across websites, products, campaigns and reports to explain transformation and position solutions. **From 27 September 2026, however, these messages will need to stand up to much closer scrutiny.**





Directive (EU) 2024/825, Empowering Consumers for the Green Transition (EmpCo), raises the bar for how environmental claims are communicated by strengthening protection against misleading commercial practices and greenwashing. While its direct scope is focused on B2C commercial practices, **its relevance can extend to predominantly B2B companies when their communications reach consumers, are repurposed in consumer-facing contexts, or take on a commercial role in communications aimed at consumers.**

Why should this matter to you?

If you are responsible for **Sustainability, Communications, Corporate/Public Affairs, or are part of the C-suite**, and your company communicates sustainability-related commitments, progress, products, partnerships or solutions, EmpCo introduces a broader question:

Can we demonstrate exactly what we are communicating, with the same scope and in the context in which it is ultimately used?

Answering this question starts with understanding what EmpCo actually changes.

02 What changes?

What does EmpCo really require?

The regulatory change can be summarized into three main areas.

01

Sustainability claims, labels and commercial communication

New restrictions on generic environmental claims, claims that improperly broaden their scope, certain offset-based claims, future environmental commitments, sustainability labels and comparative claims.

02

Durability, repairability and premature obsolescence

New prohibitions on false durability or repairability claims, practices linked to software updates, features that limit product lifespan, premature replacement of consumables, and the concealment of limitations associated with alternative parts or accessories.

03

Consumer information and guarantees

New obligations relating to commercial durability guarantees, the availability of updates, repairability, spare parts, repair instructions and restrictions, as well as a harmonized notice and label in certain cases.

For sustainability and corporate communications, the first area is particularly relevant, as EmpCo introduces new prohibited practices and strengthens the requirements applicable to environmental claims, including future environmental performance claims^[1]. Beyond raising the compliance bar, these changes can also reshape how companies demonstrate sustainability performance and differentiate themselves.



03 Opportunity

EmpCo does not mean communicating less. It means communicating with greater precision



Seen through this lens, **EmpCo should not be viewed solely as a compliance requirement.** By raising the standard for environmental communication, it can create a **stronger** basis for **differentiation**. As broad or weakly substantiated claims become harder to use, companies with robust evidence, measurable progress and credible implementation plans will be **better positioned** to turn sustainability ambition into tangible proof of real transformation.

The opportunity goes **beyond communication**. Stronger substantiation can help companies connect sustainability ambition more closely with execution, strengthening target-setting, governance and the link between sustainability outcomes and business value. Companies able to demonstrate where their business enables sustainability outcomes, and where those outcomes in turn contribute to the business, can **strengthen stakeholder confidence** and stand out through evidence of **genuine progress rather than generic ambition**.

The real advantage will lie not in making bolder claims, but in turning sustainability ambition into credible, demonstrable progress.

Realizing this opportunity requires moving from principle to process, embedding stronger substantiation, consistency and governance into the way claims are managed over time.

04 What to do?

Five steps to manage claims throughout their entire lifecycle

Turning these principles into practice requires a structured approach to claim governance. As claims are adapted and used across teams, channels, formats, languages and third parties, companies need to preserve their accuracy, scope and context throughout the entire lifecycle.[2]



To manage this consistently, we propose a five-step methodology:

1

IDENTIFY

Map where claims appear and determine which ones require priority review: Prioritize claims with higher exposure, complexity or regulatory sensitivity, including consumer-facing claims, generic environmental terms, future environmental targets, labels, offset-based climate claims and repurposed content.

2

CLASSIFY

Understand what is being communicated, to whom and in what context: Define the audience, purpose and type of claim, and assess the overall impression created by the wording, visuals, labels or symbols. Identify whether the communication includes a future environmental performance claim requiring additional controls.

3

SUBSTANTIATE

Ensure the evidence supports exactly what is being communicated: Confirm that the scope of the claim matches the scope of the evidence, and link it to its source, methodology, timeframe, baseline, assumptions and limitations. For future environmental performance claims, ensure that commitments are supported by a detailed and realistic implementation plan with measurable and time-bound targets, allocated resources and regular independent verification.

4

CONTROL

Preserve accuracy, scope and context when the claim is reused: Define how wording, qualifications, visuals and supporting evidence may be adapted across channels and audiences. For future claims, maintain alignment between the communicated claim and the underlying implementation plan.

5

REVIEW

Keep the claim and its supporting evidence up to date throughout its lifecycle: Assign ownership and review cycles to update, reformulate or withdraw claims when the evidence, methodology, product, regulation or context changes. For future claims, include regular independent verification and reassessment when the implementation plan changes.



Ultimately, strong claim governance is what allows companies to preserve credibility over time, ensuring that claims remain accurate, substantiated and relevant as they evolve across channels, audiences and contexts.

Main sources

[1] Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024, OJ L, 6.3.2024.

[2] European Commission, *Questions & Answers - Directive on empowering consumers for the Green Transition*, "Sustainable consumption" page, updated 30.06.2026.

Note: This publication provides a general and strategic overview of EmpCo and does not constitute legal advice. Its specific applicability should be assessed in light of the relevant national transposition legislation, the context of the communication and the specific circumstances of each case.





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